

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISIONIN RE: CHANTIX  
(VARENICLINE) PRODUCTS  
LIABILITY LITIGATION

Master File No.: 2:09-CV-2039-IPJ

MDL No. 2092

This Document Relates To:

**Plaintiff's Motion for Leave to File  
Documents Under Seal**

ALL CASES

**PLAINTIFF'S MOTION FOR LEAVE TO FILE  
DOCUMENTS UNDER SEAL**

On June 15, 2012, pursuant to Pretrial Order No. 4D (doc. 391) and the Court's Order (doc. 595), Plaintiffs intend to file responses to Defendant's *Daubert* and summary judgment motions. Plaintiffs' responses contain direct quotations from documents that Pfizer has designated as confidential pursuant to the protective order in these proceedings. *See* Pretrial Order No. 3. Additionally, the motions will be supported by exhibits which have also been designated as confidential pursuant to the protective order in these proceedings. *See id.* To maintain the confidentiality of those documents, Plaintiffs hereby move the Court to allow them to file the responses and all exhibits under seal.

Respectfully submitted this the 11<sup>th</sup> day of June, 2012.

/s/ Ernest CoryErnest Cory  
Cory, Watson, Crowder & DeGaris  
*Plaintiffs' Lead Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 11, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification to the attorneys of record.

s/ Ernest Cory  
Of Counsel